

**IN THE CIRCUIT COURT FOR
MONTGOMERY COUNTY, ALABAMA**

THEODORE DAVIS,

Plaintiff,

v.

**ARMSTRONG RELOCATION, LLC,
EDNA DUMAS, et al**

Defendants.

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CV-2004-370

**DEFENDANT EDNA DUMAS' RESPONSES
TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

COMES NOW Defendant Edna Dumas, by and through her attorney of record, and in response to the Plaintiff's Request for Admission states as follows:

1. Admit or deny that you had the furniture and personal belongings removed from the house at 207 Rosedon Drive, Montgomery, Alabama 36116.

RESPONSE: Admitted.

2. Admit or deny that you had someone call the moving company Armstrong Relocation to remove the furniture from the house at 207 Rosedon Drive, Montgomery, Alabama 36116.

RESPONSE: Admitted.

3. Admit or deny that Mr. Davis was living at 207 Rosedon Drive, Montgomery, Alabama 36116, since 1994 with your permission, when you asked him to vacate the property.

RESPONSE: Admitted.

4. Admit or deny you had additional people with you when you instructed Mr. Davis to get out of the home at 207 Rosedon Drive, Montgomery, Alabama 36116.

RESPONSE: Admitted.

5. Admit or deny that you have received and/or cashed or deposited money orders from Mr. Davis.

RESPONSE: Admitted.

6. Admit or deny that you have sold the house at which Mr. Davis was living, 207 Rosedon Drive, Montgomery, AL 36116.

RESPONSE: Admitted.

7. Admit or deny that you called people listed in Mr. Davis' address book.

RESPONSE: Denied.

8. Admit or deny that you told the people which you contacted that they needed to get checked out by a doctor due to Mr. Davis having a disease.

RESPONSE: Denied.

9. Admit or deny that you filed a restraining order against Mr. Davis but did not show up for the hearing.

RESPONSE: Admitted. I was not aware of when the hearing was scheduled.

10. Admit or deny that, prior to the 18th of January, 2004, you lived out of the State of Alabama.

RESPONSE: Admitted.

11. Admit or deny that you had given Mr. Davis permission to live at 207 Rosedon Drive, Montgomery, Alabama 36116 prior to January 18, 2004.

RESPONSE: Admitted.

12. Admit or deny that, since January 18, 2004 you have contacted Mr. Davis' former employer and made statements to them that were intended to harm Mr. Davis.

RESPONSE: Denied.

13. Admit or deny that, you have sold an idea and/or invention regarding the care of minor children.

RESPONSE: Denied.

14. Admit or deny that you work more than one job.

RESPONSE: Admitted.

15. Admit or deny that you live at 36 Jersey Street #9, East Rutherford, NJ 07073.

RESPONSE: Denied.

16. Admit or deny that Eddie Woods was one of the parties with you at the time you advised Mr. Davis to leave the home he had been living in since 1994.

RESPONSE: Admitted.

17. Admit or deny that Eddie Woods was the party that actually called the moving company to come move the furniture.

RESPONSE: Admitted.

18. Admit or deny that you told people they could have Mr. Davis' furniture and/or personal property.

RESPONSE: Denied.

19. Admit or deny that you did not have Mr. Davis' permission to remove his furniture or personal belongings from the address of 207 Rosedon Drive.

RESPONSE: Admitted.

20. Admit or deny that you have the safe in the house opened and the contents removed from the safe.

RESPONSE: Denied.

21. Admit or deny that you gave the pictures in said safe to other parties to review.

RESPONSE: Denied.

22. Admit or deny that you stayed the night of January 18, 2004 at 207 Rosedon Drive, Montgomery, Alabama 36116.

RESPONSE: Admitted.

23. Admit or deny that you did not bring a bed or other furniture with you to the house on January 18, 2004.

RESPONSE: Admitted.

24. Admit or deny that your nephew is Eddie Woods.

RESPONSE: Admitted.

25. Admit or deny that Eddie Woods did bring other men with him to the house at 207 Rosedon Drive on January 18, 2004.

RESPONSE: Denied.

26. Admit or deny that you disposed of Mr. Davis' clothing in the house after he left at your instructions and that of the Police Officer Mr. Watts.

RESPONSE: Denied. Mr. Davis' clothing was placed in the front yard.

27. Admit or deny that you or someone with you had the furniture taken out of the house.

RESPONSE: Admitted.

28. Admit or deny that you routinely handled the record keeping for Mr. Davis.

RESPONSE: Denied.

29. Admit or deny that the damage allegedly caused to Mr. Davis as a result of the destruction of his personal property, furniture and papers took place while you had control of said

property that was in the home at 207 Rosedon Drive.

RESPONSE: Unable to admit or deny.

30. Admit or deny that you have not compensated Mr. Davis for any property damage claims resulting from the damage or destruction of his personal property or papers.

RESPONSE: Admitted.

31. Admit or deny that you did not allow Mr. Davis to remove his property from the house before you had the property removed.

RESPONSE: Denied.

32. Admit or deny that you showed Officer Shelly Watts video tapes involving Mr. Davis and other parties.

RESPONSE: Denied.

33. Admit or deny that you provided some if not all of these tapes to Officer Watts.

RESPONSE: Denied.

34. Admit or deny that you turned over a bag with tapes of Mr. Davis in it to an officer of the Montgomery Police Department.

RESPONSE: Denied.

35. Admit or deny that there was a large screen T.V. in the house on January 18, 2004.

RESPONSE: Admitted.

36. Admit or deny that there was furniture in the house at 207 Rosedon Drive on January 18, 2004.

RESPONSE: Admitted.

37. Admit or deny that there was food and beverages in the house at 207 Rosedon Drive on January 18, 2004.

RESPONSE: Admitted.

38. Admit or deny that there was clothing, pictures, and papers in the house at 207 Rosedon Drive on January 18, 2004.

RESPONSE: Admitted.

39. Admit or deny that you did not own the furniture, T.V. or food in the house at 207 Rosedon Drive on January 18, 2004.

RESPONSE: Denied. However, I did not own the food in the house.

40. Admit or deny that you never turned any of the furniture, clothing or papers over to Mr. Davis after you took control of his personal property.

RESPONSE: Denied. Mr. Davis' family took a number of his possessions.



JEFFREY W. SMITH (SMI088)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing document upon the below listed counsel of record, by placing copy of same in the United States Mail, postage prepaid this the 11 day of March, 2005:

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OF COUNSEL

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